Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Parts 22 and 90 of the	)	
Commission's Rules to Reallocate Certain	)	RM-11311
150 MHz Public Mobile Radio Service	)	
Frequencies to the Public Safety	)	
Radio Services	)	

To: The Commission

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby submits the following comments in support of the above-captioned Petition for Rulemaking filed by Icom America, Inc. ("Icom").

APCO is the nation's oldest and largest public safety communications organization. Founded in 1935, APCO has over 16,000 members, most of whom are state or local government employees who manage and operate communications systems for police, fire, EMS, highway maintenance, forestry conservation, disaster relief, homeland security, and other public safety agencies. APCO is the largest certified frequency coordinator for Part 90 Public Safety Pool channels, and frequently appears before the Commission on matters related to public safety communications. APCO is a member of the National Public Safety Telecommunications Council ("NPSTC"), and supports NPSTC's separate comments in this proceeding.

Icom recommends that the Commission reallocate certain Part 22, paging channels in the VHF band (150 MHz) for public safety services. APCO supports this

recommendation and urges the Commission to initiate a rulemaking proceeding as soon as possible to address this important issue.

Many public safety agencies rely heavily upon VHF channels for their core radio communications systems.[1] The band has traditionally been especially popular in sparsely populated areas where radio systems require wide area coverage with the minimum number of transmitters, in heavily forested and mountainous areas where other bands face propagation challenges, and by small agencies/departments in both rural and urban areas attracted by the relatively low cost of VHF equipment. Indeed, there are many states for which VHF is the principal state-wide public safety frequency band, and there are many counties and municipalities for which VHF has always been their only frequency band for all public-safety radio traffic. While 800 MHz, and soon 700 MHz, will provide significant opportunities for new public safety communications systems, there will continue to be a need for VHF radio systems in much of the nation.

Unfortunately, the VHF channels in the Public Safety Pool are so heavily used that there is little or no opportunity for new licenses or to expand existing radio operations. Even in sparsely populated rural areas, VHF channels often cannot be assigned without creating co-channel interference issues.[2] The VHF band, which was allocated decades ago, also lacks standard pairing, which limits the ability to implement efficient trunking systems. There are many instances where VHF repeater operations

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[1] "VHF" in this context refers to VHF "High Band" channels at 150-170 MHz, not to VHF "Low Band" channels on frequencies below 72 MHz, which are still in use in some states. Public safety has been moving off of Low Band over the last several decades due to unstable propagation (e.g., "skip"), antenna requirements, and the lack of portable (or other state-of-the-art) equipment.

[2] As with other Public Safety Pool channels below 470 MHz, the VHF band is assigned on a "shared basis" with no guarantee of exclusivity. However, public safety frequency coordinators attempt to assign channels to minimize potential interference.

currently exist (using the only "pair" of frequencies that were then available for licensing) and the repeater input and output frequencies are spaced too close together for efficient duplex operations. In other cases, the VHF repeater input frequency is also used for base station operations within an inadequate distance for a proper separation. The absence of "white space" in the VHF band also makes it far more difficult to migrate to narrowband technologies.

The Part 22 paging channels identified in the Icom Petition lay fallow in many areas, despite repeated auctions. While there may be little or no commercial market for paging channels in these areas, there is a significant demand for additional VHF public safety channel capacity. Therefore, APCO urges the Commission to proceed quickly to adopt a notice of proposed rulemaking regarding this matter.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL, INC.

By: 

Robert M. Gurss
Director, Legal & Government Affairs
APCO International
1725 DeSales Street, NW
Suite 808
Washington, DC 20036
(202) 833-3800

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